

UNITED STATES DISTRICT COURT

for the

District of _____

Division _____

Case No. _____

(to be filled in by the Clerk's Office)

Christopher S. Ratio La'Hare Chapman

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

United States Postal Service, Woodforest
National Bank, Amber O. Anderson, Tonie
Quick, T-Mobile

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE ALLEGING BREACH OF CONTRACT
(28 U.S.C. § 1332; Diversity of Citizenship)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Christopher S. Ratio La'Hare Chapman

Street Address

1831 WYNTON ROAD

City and County

COLUMBUS

State and Zip Code

GA 31906

Telephone Number

(678) 389-0793

E-mail Address

gideon.bertholomeu.kw@gmail.com**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name United States Postal Service
 Job or Title (if known) Postal Service Inspector
 Street Address 6 MF Columbus GA 31907
 City and County Accounts payable Branch
 State and Zip Code Po Box 80143 St Louis MO
 Telephone Number 63180 (1866) 974-2733
 E-mail Address (if known) _____

Defendant No. 2

Name Wood Forest National Bank
 Job or Title (if known) Financial Institution
 Street Address 1451 WoodRuff Road
 City and County Greenville, SC
 State and Zip Code SC 29607
 Telephone Number 1-877-4642-WNB
 E-mail Address (if known) _____

Defendant No. 3

Name Amber O. Anderson
 Job or Title (if known) Lead Case Worker
 Street Address 469 Marietta Street NW
 City and County Atlanta
 State and Zip Code 30313
 Telephone Number (404) 486-2732
 E-mail Address (if known) Amber.Anderson@uss.silverthearmy.org

Defendant No. 4

Name Tonie Quick
 Job or Title (if known) owner
 Street Address 1695 Delow Drive SW
 City and County Atlanta
 State and Zip Code GA 30313
 Telephone Number (404) 840-1998
 E-mail Address (if known) toniequick@yahoo.com

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

A. The Plaintiff(s)

1. If the plaintiff is an individual

The plaintiff, (name) Christopher S. Bates LaPlante Clam, is a citizen of the State of (name) GA.

2. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) Tonie Quick, Amber O Andersen, is a citizen of the State of (name) GA. Or is a citizen of (foreign nation) _____.

2. If the defendant is a corporation

The defendant, (name) United States Postal Service, is incorporated under the laws of the State of (name) MO, and has its principal place of business in the State of (name) St Louis MO. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) St Louis MO.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.) (See Attached)

C. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

(Please see Attached)

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The plaintiff, (name) Christopher S. Rocio LaFlare Chapin, and the defendant, (name) United States Postal Service, Tonic Quick, Abby Adams made an agreement or contract on (date) IN or Around 2021 - 2022. The agreement or contract was (oral or written) Both. Under that agreement or contract, the parties were required to (specify what the agreement or contract required each party to do) Provide Certain Services, Insurances, And Disclosures.

The defendant failed to comply because (specify what the defendant did or failed to do that failed to comply with what the agreement or contract required) Failed to provide insurances, services, And Failed to protect certain property, And or information

The plaintiff has complied with the plaintiff's obligations under the contract.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Return of properties. \$150,000
Monetary Compensation for loss.

THE DISCRIMINATION MANIFESTO

This letter is to inform you of the gender and political discrimination I experienced while being a resident at your facility located 400 Luckie st Atlanta Ga 30033. In this letter I will set forth the detailed facts of how one of your authorized staff members Ms. Amber Anderson discriminated towards me after my initial sit down conversation with her. It would be during this conversation that I would share details about my life with Ms. Anderson. Details such as where I moved to Atlanta from, why it was I had to move, what job I had before I left, as well as my political position and the amount of constitutional support I had from my constituents on Capital Hill. Not only did Ms. Anderson show her personally fueled discrimination towards me, but she also had no regard, neither showed any compassion that I was a United States Navy Veteran who suffered severely from Post Traumatic Stress Disorder, and Depression. I Note that not only was Ms. Anderson made fully aware of my diagnosis, but I also explained to her of my recent hospitalization due to a post traumatic episode triggered by a abusive relationship I was a victim of. Instead of taking the information shared with her to heart and using it to help better understand both me and my situation, Ms. Anderson used this information against me in a way where she exerted her power over me while I was already in a very vulnerable state. Ms. Anderson knew that because I was forced to leave my home because of being a victim of domestic violence that it had been a week since I was able to speak with my 13 year old daughter. Although made fully aware of the mental trauma I was enduring at the time of my stay at your facility, Ms. Anderson still showed no regard. Instead she chose to discriminate towards me for the reasons and facts set forth in this claim. I should also note that leading up to my departure from your facility I orchestrated a petition of which more than 12 VOM residents whom identities I have agreed not to disclose unless in the event this claim is brought before the US District of Columbia Superior Court.

Facts alleged, and set forth:

Ms. Anderson's discriminative bias towards me stems from a negative past experience with a man that I remind her strongly of. I learned this from a conversation I over heard Ms. Anderson having with a unknown individual on the phone in her office. Ms. Anderson was not aware of the fact that I was outside her door way awaiting to ask her for under garments and hygiene products as instructed by the front desk staff at the Salvation army facility that I was a resident at. I would also later learn that Ms. Anderson was a lesbian, and because of her lack of making any effort to understand me, she assumed that because I was a registered Republican in District of Columbia, that I supported the ideas and views expressed by former president Trump about his opinions of homosexuality. She automatically assumed that I was a Trump supporter and that I opposed the LGBTQ friendly views of former president Barack Obama. Ms. Anderson made this assumption based on her ignorance of not knowing the many trainings I have completed on the subject of how to respect the rights of LGBTQ community. Not to mention, a very dear friend of mine is a homosexual and is infact happily married in a same sex marriage. I have absolutely no ill will or thought towards that community of individuals who decided to express their free rights however so they will. Ms. Anderson was made aware of the fact that I was a registered Republican during our initial sit down conversation, where I jokingly shared with her that I was a "Black Republican", and that on Capital Hill they referred to Black Republicans as Unicorns because we were rare finds. I should note that almost immediately after sharing this information with Ms. Anderson her demeanor

and attitude immediately became defensive, aggressive, challenging, and standoffish upon me sharing my political affiliation and position with her.

Ms. Anderson's false representation of my actions and compliance of policies and rules of her program:

Ms. Anderson alleges that I did not comply with the rules of in her own words "her program". When infact the day after being instructed to go to the Va Hospital to have a COVID-19 and TB test performed and to report back to Ms. Anderson I did just that. As a matter of fact, I received a call on my cell phone from a individuals who's name I cannot recall at this time, but Ms. Anderson will be able to recall this invidual because it would be 5 minutes after being instructed by him that my test were good and that I should report to Ms. Anderson and complete a intake assessment that I met Ms. Anderson in her office. I relayed all information to her and her response about completing my assessment was and I quote "I don't feel like dealing with it right now, check back with me sometime tomorrow". Never giving me the opportunity to explain to her that I had a interview the next morning at the UPS store in Lindbergh. It would be the day after my interview at the the UPS store that I would see Ms. Anderson upon me

entering the building at 4:00pm Immediately upon seeing me, aggressively positioned herself in the middle of my face very close and said "where have you been. I told them that you were not in my program any more, so I don't know, you may not have a bed". It was at this point when I proceeded to inform Ms. Anderson that I had a interview in Lindbergh and that I had attempted to tell her the day before but her inability to listen to me, prevented me from telling her. I should note that it would be during a later conversation that I would express to Ms. Anderson how her yelling at me that day caused me to fall into a black hole of depression. One reason being that I lost my mom six years ago and the aggressive approach and attitude made me feel threatened, venerable , and disconnected in such a way that made me think about the times that I could talk to my mom during challenging times like this. Ms. Anderson also contributed to my depression because being that I am a recent victim and survivor of domestic violence, a fact of which Ms. Anderson was made full aware by me personally during our initial sit down conversation. Note* I should also note that this to is information Ms. Anderson would use against me. Moving forward Ms. Anderson would say that I needed to go get another covid test and report to her Sunday during her scheduled work hours. Ms. Anderson alleges that by exercising my right to be COVID-19 vaccinated instead of having a COVID-19 test performed on me for the second time within a week meant that I did not comply. I should also note that Ms. Anderson was made aware of the uneasy discomfort that I experienced when I would take a COVID-19 test. She was made aware of this because I explained it to her in a conversation we had a few days before this. Ms Anderson found pleasure in causing me this uneasy discomfort because in her own way inflicts some form of retaliation towards those past men, people, experience, or disorder she has been wronged or shown injustice by . On that following Sunday during Ms. Anderson's working hours I informed her of my COVID-19 vaccination and I produce both the vaccination card, and results of my TB test. Ms. Anderson said that I was not in compliance of her direct order and like she has already made clear to me I am not for her program and that I should find somewhere else to go. I again explained to Ms. Anderson my domestic violence experience and that I had nowhere to go. I then ask Ms. Anderson what have I done to her and why does she show so much aggression and anger towards me. I asked her why does she continue to place barrier after barrier against me. Ms. Anderson's response to my question was and I quote "Mr. Chapman you are the barrier, you are the problem". At this response I was floored. Ms. Anderson's response devastated me to the point to where I had to take a seat in her office. I would later come to understand that in part what Ms. Anderson was saying was that me, the man , the registered Black

Republican, was the barrier and the primary cause of the personal issues I was facing. By this statement alone made by Ms. Anderson shows her personally fueled discrimination towards me. I should note that when asked what she meant by her statement Ms. Anderson had no response, but only continued to show signs of aggression. Ms. Anderson then said that if I didn't have my COVID-19 test by the end of the work day Monday, that I would be put out of her program. That following Monday I reported to the Veterans facility on Fort McPherson in which when after meeting with the Doctor there informed me that she was unable to administer a test because the 2nd covid test I had just received was still valid. I should also note that on several occasions Ms. Anderson said in her own words, " was expired, and no good". This is the same test VA Doctors said was good and valid. This act of conspiracy made by Ms. Anderson in a effort to cover up the truth in order to deprive me of my rights only supports my claim. MS Anderson would use this as her reason to put me out of what she calls" her" program .

Ms. Anderson went against the Salvation Army Code Of Conduct and basic principles when for no reason other than her personal bias and discrimination towards me put me out on the streets with absolutely nowhere to go. Not only did Ms. Anderson discharge me from the facility and the property, but she did so in a way that lacked compassion, respect, and integrity. Seeing that Ms. Anderson was fully aware of the facts made known to her surrounding my situation. The fact that I had fled from Washington DC, escaping domestic violence. 2. The fact that I had absolutely no friends, family, financial aid or resources. 3. The fact that I was in fear and could possibly be in immediate danger if my abusive ex or someone she knew saw me walking helplessly through the streets at night. Ms. Anderson was made aware that my ex was a very resourceful woman that works for the Department of Justice policy's very well connected with colleges upon Atlanta and that she also had a strong social media presence is my belief that Ms. Anderson gained self satisfaction from seeing me in such fear and by knowing she was putting me in danger from potentially being assaulted by my abuser . I support my claim of Ms. Anderson's gross, wanton, and willing negligence by this set of facts:

For no reason at all other than Ms. Andersons fraudulent claim that I failed to comply with Covid-19 testing policy. When in fact, I received not 1, but 2 COVID-19 test, and a vaccination. Not to mention the TB test that I received in compliance with policy and had reviewed by authorized VA doctors. Which needs less to say, was negative. I should note that Ms. Anderson knowingly conspired and fabricated the truth when she aggressively told me misinformation by saying my 2nd covid test was expired. When in fact authorized Va doctors said it was not. Ms. Anderson took it upon herself to come into the men's dormitory sleeping area at approximately 4:00pm. Come to the bed I was assigned to and proceed to wake me up and tell me that I had 10 minutes to leave the facility or else the local authorities would be called. I asked her what did I do, her response was "you need to leave". She continued to walk out as she was saying this. After putting a shirt on, I went to her office and again asked her what did I do. She again replied that I needed to get my stuff. I begin to plead with her repeating over and over that I had absolutely nowhere to go and that I have absolutely no friends or family within a 4-8 hours by car within the city of Atlanta. I also pleaded repeatedly with her that by it being a Sunday evening, no emergency shelters were doing intake assessments. A fact that undoubtedly, Ms. Anderson knows. Her response was here's couple of bus passes and hers a phone number. My response was"Ms. Anderson I have no money, no resources, can I get some food before you put me out in the streets. This isn't the way you should do this, how can you just put a Veteran out on the street with nothing on a Sunday. Can I get into the emergency bed program". It was also at this point that I informed her of how the director of the \$10 bed program had told me the day prior that if I ever needed to get into his program, that he could help

me with that transition. When I made her aware of this fact her response was no you can't have any services, this isn't the place for you, you need to go. It was at this point that I became light headed and nauseous and sweating to the point of nearly blacking out. At the same time I was explaining to her how within the last 2 months I was hospitalized 3 times for mental health post traumatic stress disorder episodes and how I felt like I was about to pass out and how this whole situation was bringing multiple flash back visions and anxiety. I should note that Ms. Anderson had no response, but just stood back and looked at me, never once offering assistance or even a drink of water for that matter. After gaining my composure I returned to the dorm to gather my things. 5 minutes later, the same staff member mentioned before, who had previously told me that he had no issue with me enrolling into his \$10 a day bed program under the stipulation that I obtained employment within 3 days of entering his program. It would be this staff member who 5 minutes after my returning to the dorm, would come inform me that under the direct instruction of Ms. Anderson he was told to let me know that I had exactly 5 minutes before the police would be called on me. After this, my anxiety, trauma, and fear escalated to the point where I threw all of my items into one large trash bag and put them in the lobby area located in the 2nd floor hallway to Ms Anderson's office. I then notified Ms. Anderson that I was leaving the building and that my belongings were in the hallway and that I would come back to get them tomorrow once I was able to calm myself from experiencing a mental illness episode. Her response was "okay that's".

I should note, that this would be Ms. Anderson's 2nd threat of calling the police on me as if I was a criminal. When in fact, during my stay at the Salvation Army facility, I always displayed good character, integrity, compassion, welcomed diversity, always having respect, for not only myself, but of all other's. Never did I do anything deserving of having authorities called on me. This only shows and supports my claim of Ms Anderson discrimination, and harassment towards me. Fueled by facts concerning my homelessness circumstances disclosed in confidence of confidentiality to your authorized staff member Ms. Amber Anderson. Confidentiality policies, and rules in which, I might add Ms. Anderson disregarded. Breaking all confidentiality federally provided to survivors of domestic violence, right to choose and practice religion, gender, political persuasion and affiliation without facing the backlash of discrimination from businesses or individuals. This only supports her lack of regard and respect for rules, policies and most importantly, individuals. For no reason at all, other than her fraudulent claims of "none compliance" Ms. Anderson treated me with discriminative, and bias actions when instead of being treated like a United States Navy Veteran, suffering from mental illness diagnosis, fleeing from domestic violence, and experiencing homelessness and identity theft from my abusing spouse. I was treated as a criminal, a enemy, and a alienated opposition to anything that could jeopardize the furthering Ms. Anderson's personal agenda. Her gender, political, religious discrimination towards me fueled by multiple layers of various faucets of harassment are direct violations of my Constitutional, and Individual Rights. Not to mention, the rights that are promised by Red Shields Salvation Army to be respected and protected for individuals as myself by your facilities and staff members or authorized representatives. These rights are promised to be respected and protected by Red Shield Salvation Army per your Code Of Conduct. Which clearly states in it's Basic principles section that "all salvation army employees are to expected to behave in a ways that are allienghed with the organizations mission and values.

It is not my wish to seek relief through the federal, Superior, or civil court system. Which could in turn damage the reputation, legacy, and respect from all communities of people's and genders that your Organization has earned over the years. Especially in Atlanta, events like these of such alarming

magnitudes would be viewed through negative lenses by the residents of Atlanta. Being that if for any reason we were not able to resolve this issue of harassment, bias, discrimination, violation of civil, individual, Constitutional rights short of my obtaining a Attorney and filing a Civil Claim. That it is and would be my obligation to inform both the public and residents of the city of Atlanta of your Organizations actions. With this being said, out of respect for the Red Shields Salvation Army Organization I have agreed to settle this issue with you short of filling a Civil Claim under these conditions set forth:

This experience spiraled me into a hole of depression. Since this event, I have had to enroll and attend various counseling sessions as well as domestic violence victims of ridiculed and mistrust program in Columbus Georgia of which I am a resident of right now at this time. A program and organization in which has personal knowledge of a sexual assault that took place in Atlanta while I was in the streets with absolutely nowhere to go as the result of being discharged on a Sunday evening by Ms. Anderson for no reason other than her unsupported claim of non compliance of taking a COVID-19 test when in fact I was administered 2 and a TB shot, COVID-19 vaccination. All within a 2 week time frame. I dare to point out the fact that the only individual who was in non compliance was your authorized representative, Ms. Amber Anderson for her failure to comply with the rules and principles set forth by your Organization . Further more, as a result of the sexual assault I experienced as a direct result of her discriminative actions, I will have to seek counseling f for the next several years of my life. Being faced with the embarrassment and shame of that very night it took place. This trauma coupled with the reoccurring nightmare of the incident of the assault that took place in Woodruff park because by me not being from here, the homeless community at Woodruff park did not accept me and said that in order for me to continue to be there I needed to be in their words, " initiated". These emotional wounds have mentally disenfranchised me to the point of sever long term trauma that will result in years of costly counseling. Most of which must be administered by private professionals. Seeing that as a result of Ms. Anderson's lack of respect for confidentiality policies, I can no more trust public individuals with information and knowledge of my background, circumstance, political affiliation, and gender association. Being that when I did disclose and make these facts known, they were used as instruments of discrimination, bias, and stigmata. In light of the facts that I've set forth in this letter before action I will agree to resolve this issue under these conditions:

1. A supervised mediated conference attended by myself, supervising mediator/board, and Ms. Anderson where I can be provided the opportunity to ask Ms. Anderson what was meant by her statement and I quote "Mr. Chapman you are the barrier". A statement which continues to depress and mentally scare me even this very moment. I should note for the record that this statement alone made by Ms. Anderson was discriminative both in context and insinuation. A comment that when asked for clarification, Ms. Anderson could offer no response. A question that if not asked by me, will definitely be asked by my attorney during the anticipated discover phase leading to court proceedings. I should note for the record that I am a resident of District of Columbia. I am also a registered voter there. This is where I intend to file my claim.
2. \$150,000 Monetary settlement. If for no other reason than the mental, emotional, sexual trauma , and triggered depression. Which can easily result into millions of dollars when calculated for pain and suffering. I anticipate pursuing the full extent of competition to be awarded in the event that I file a claim.

3. That Ms. Anderson participate in trainings, and or classes that provide comprehensive tool's and education on how to respect the protected rights of individuals in the work place. That she be educated on the importance of the many law' and principles concerning confidentiality. It is my prayer that such education will prevent this type of discrimination and harassment from happening to another person who may be facing not only homelessness, but many other important circumstances similar to mine as a result of Ms. Anderson's lack of fundamental work place education.

Final remarks:

In good faith, I have agreed to allow 14 days from the date of this letter for you to respond via the email address provided with your position concerning this matter. In anticipation of this matter not being resolved, I have already made contact with high profile civil attorneys of which have all agreed with excitement to represent my case on a pro Bono , contingency basis. In that event, I feel secure by standing on if nothing else, the facts already set forth in this final letter before action., that if presented before the court I will prevail triumphantly.

Respectfully,

Christopher S.

Chapman

Tonie Quick <toniequick@yahoo.com>

To:gideon.bartholomewlaw@gmail.com,Desiree Dudley

Sun, Feb 6 at 6:34 PM

Good evening Mr. Chapman and Ms. Dudley,

Mr. Chapman, please accept this as a 60-Day notice to vacate Room 6 at 1695 Delowe Dr, Atlanta Ga 30311. Please have your items removed by April 7, 2022 @ 12:00pm. You will also receive a paper copy of this email posted on your room door. As is the law, landlords are not required in most cases to provide a reason for such notice, however, for the PCCIs information the reasons are as follows:

Mr. Chapman called to inform me, Tonie, that money in the sum of \$540 had been stolen from his room by Natasha in Room 4. (Natasha is Not a member of PPCIs program) I asked Mr. Chapman for proof, but he offered conjecture and speculation. He then proceeded to threaten to "do something to" Natasha. He said he contemplated "kidnapping" her. He said he would wait until 10:00am (almost 2 hours later) to see if "someone" returned his money, if not he would "wipe her nose" (which I understood to mean punch her in the face).

When my husband got home, we headed to the property to see about the matter in person. While we were on the way, Mr. Chapman called to say that he expected us (me/Mr. Barnes) to repay the missing money or he would sue us for negligence. He stated that we were negligent and therefore responsible. He offered to "keep it in house" and not call the police if we gave him the money right away. I declined his generous offer.

When we arrived at the house, I questioned Natasha. Natasha said Mr. Chapman borrowed money from her (\$40+\$20) and said he would return the money with interest, \$70. Natasha said Mr. Chapman gave her collateral: a pair of sneakers, sunglasses, and a Visa card. She further stated that Mr. Chapman has paid back \$30.

When I shared this new development with Mr. Chapman, he became even more belligerent. He even called the police. The officer came and went after speaking with Mr. Chapman and did not speak with anyone else in the house, including me nor Natasha.

Because of the threats of violence against another member of the house, his belligerent behavior towards me, and because I believe he attempt to extort money from us, we are asking Mr. Chapman to vacate the premises.

Georgia law does provide for shorter notices to vacate for certain escalated matters, so if Mr. Chapman should decide to do other than remain peaceful for the next 60 days, we will seek legal action to further shorten his stay.

BarQuick
404-840-1998

A pessimist sees the difficulty in every opportunity; an optimist sees the opportunity in every difficulty. – Winston Churchill

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 07/08/2022

Signature of Plaintiff

Printed Name of Plaintiff

Christopher S. Peter Lofler Chaplan

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address